

MAHER & PITTELL, LLP

ATTORNEYS AT LAW

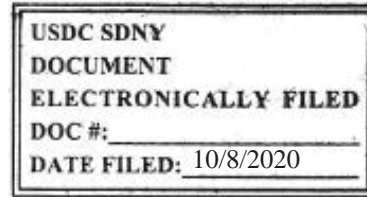
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October 2, 2020

Hon. Alison J. Nathan
U.S. District Court
40 Foley Square
New York, NY 10007



Re: *US v. Pena Montero and Lora Jimenez*, 19 Cr 52

Dear Judge Nathan:

I am counsel for Carlos Alberto Lora Jimenez, a defendant in the above referenced matter.

Previously, Mr. Lora Jimenez pleaded guilty, before Judge Batts, pursuant to a Plea Agreement.

Sentencing is currently scheduled for October 15, 2020. I am aware that, in some instances, sentences have been proceeding by videoconference. However, in this matter, it is my preference that the sentencing occur in person as Mr. Lora Jimenez has only appeared before Judge Batts in this case. In light of the ongoing uncertainty as to when in-person sentencing proceedings will fully resume, I respectfully request the sentence date be adjourned for at least 90 days. Additionally, I make this request as Mr. Lora Jimenez, and his family (who seek to be in court for the sentencing proceeding), all reside in Miami, Florida. Due to quarantine requirements imposed upon travelers arriving from Florida, it may be difficult for them to travel to and from New York at this time.

In light of the foregoing, I respectfully request the sentencing date be adjourned to a date, after January 15, 2021, which is available on the Court's calender.

I have conferred with the Government and they consent to this request.

In addition, Mr. Lora Jimenez seeks to travel to Orlando, for a day trip, tomorrow. His Florida travel is limited to the Southern District of Florida. Accordingly, I respectfully request his bond be temporarily modified to allow travel to the Middle District of Florida during October 3, 2020. I have conferred with the Government and Pretrial Services and both consent to his request. My apologies to the Court for submitting this request on short notice.

Respectfully submitted,

/s/

Jeffrey G. Pittell

cc: Mollie Bracewell/Kyle Wirshba AUSA (By ECF)
Carlos Alberto Lora Jimenez

The sentencing hearing in this case is adjourned to January 18 at 11:00 a.m. When submitting an urgent request, please alert Chambers by email after filing the request via ECF. SO ORDERED.

 10/7/2020